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February 10, 2012

Mr. Partap Lall
On-Scene Coordinator
U.S. Environmental Protection Agency
Region 5, Emergency Response Branch No. 1
9311 Groh Road
Grosse Ile, MI 48138-1697

**Re: Wolverine WW Tannery PRP Site
Rockford, Kent County, Michigan
Technical Direction Document Number: S05-0001-1112-010
Document Control Number: 1704-2A-AUII
Work Order Number: 20405.012.001.1704.00**

Dear Mr. Lall,

On December 14, 2011, the United States Environmental Protection Agency (U.S. EPA) tasked the Weston Solutions, Inc., (WESTON®) Superfund Technical Assessment and Response Team (START) with conducting sample oversight activities at the Wolverine WW Tannery PRP Site (Site) located in Rockford, Kent County, Michigan. The sample oversight activities entailed (1) observing the potentially responsible party (PRP) contractor, Rose & Westra, Inc. (R & W, Inc.), collecting soil samples, sediment samples, pore water samples and groundwater samples; (2) collecting split soil, sediment, and pore water samples from R & W, for analysis at Trimatrix Laboratories in Grand Rapids, Michigan; and (3) recording the oversight activities in a site logbook and through photographs. WESTON START was not directed to split groundwater samples.

This letter report provides a comparative summary of the soil, sediment, and pore water samples collected by R & W, Inc. and those samples that R & W, Inc. split with WESTON START.

COMPARATIVE SUMMARY OF ANALYTICAL DATA

Soil Samples

- (1) R & W, Inc. Sample S-1A exceeded the direct contact criteria for arsenic (37 milligram per kilogram [mg/kg]) with a result of 360 mg/kg. However, the corresponding WESTON START sample, SB-1, was below the direct contact criteria with a result of 6.2 mg/kg.
- (2) None of the R & W, Inc. soil samples were analyzed for “xylene, meta + para” or “xylene, ortho,” while none of the WESTON START samples were analyzed for “xylenes.”



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- (3) WESTON START only analyzed 2-methylnaphthalene and naphthalene as VOCs, while R&W, Inc. analyzed these two chemicals as both volatile organic compound (VOCs) and semi-volatile organic compound (SVOCs).
- (4) None of the WESTON START samples were analyzed for the following SVOCs: aniline, azobenzene, benzoic acid, benzyl alcohol, 4-chloroaniline, 4-chlorophenol, 2,6-dichlorophenol, or pyridine. However, each of the R & W, Inc. samples was analyzed for each of these SVOCs.
- (5) None of the R & W, Inc. samples were analyzed for the following SVOCs: 1,2-dichlorobenzene, 1,3-dichlorobenzene, or 1,4-dichlorobenzene. However, each of the WESTON START samples was analyzed for each of these SVOCs.

Sediment Samples

- (1) WESTON START sample SED-2 (0-6) exceeded the Consensus-Based Probable Effect Concentration (PEC) criteria for mercury (1.06 mg/kg) with a result of 2.1 mg/kg. However, the corresponding R & W, Inc. sample, SED-2A, was below this criteria with a result of 0.54 mg/kg.
- (2) WESTON START samples SED-3 (0-6), SED-3 (1), SED-4 (0-6), SED-5 (0-6), SED-6 (0-6), SED-6 (1), were below the Consensus-Based PEC criteria for mercury with results of 0.042 mg/kg, 0.036 mg/kg, 0.082 mg/kg, 0.035 mg/kg, 0.22 mg/kg, and 0.013 mg/kg, respectively. However, the corresponding R & W, Inc. samples for these WESTON START samples exceeded the Consensus-Based PEC with results of 50 mg/kg, 16 mg/kg, 50 mg/kg, 50 mg/kg, 50 mg/kg, and 50 mg/kg.
- (3) WESTON START sample SED-5 (1) was below the Consensus-Based PEC criteria for lead (128 mg/kg) with a result of 92 mg/kg. However, the corresponding R & W, Inc. sample, SED-5B, was above this criteria with a result of 130 mg/kg.

Pore Water Samples

- (1) None of the R & W, Inc. pore water samples were analyzed for arsenic, which each of the WESTON START samples was analyzed for this metal.
- (2) None of the WESTON START pore water samples were analyzed for unionized ammonia, while each of the R & W, Inc., samples were analyzed for this chemical.
- (3) WESTON START sample PW-03a exceeded the non-residential drinking water criteria for ammonia (10 mg/kg) with a result of 64 mg/kg. However, both the WESTON START duplicate of this sample, PW-03d-a Duplicate, and the corresponding R & W, Inc. sample, PW-3A, were below this criteria with results of 4.4 mg/kg and 4.8 mg/kg, respectively.



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If you have any questions or comments, please contact one of the undersigned.

Very truly yours,
WESTON SOLUTIONS, INC.

A handwritten signature in cursive script that reads "Michael T. Browning".

Michael T. Browning
START Scientist

A handwritten signature in cursive script that reads "Lori A. Kozel".

Lori Kozel
START Project Manager